

FILED 20 JUL '11 10:41 USDC ORP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

No. CR 10-510-RE

v.

SUPERSEDING INDICTMENT

**MOISES LOPEZ-PRADO,
JOSE TEXCO HILLARIO, and
ALEJANDRO ARROYO-LOPEZ**

**21 U.S.C. § 841(a)(1);
21 U.S.C. § (b)(1)(A);
21 U.S.C. § (b)(1)(C);
21 U.S.C. § 846;
21 U.S.C. § 963;
18 U.S.C. § 2.**

Defendants.

THE GRAND JURY CHARGES THAT:

COUNT 1

**[Conspiracy to Distribute and Possess with Intent
to Distribute Methamphetamine and Cocaine]**

Beginning at a time unknown and continuing up to and including July 7, 2011, in the District of Oregon and elsewhere, **MOISES LOPEZ-PRADO, JOSE TEXCO HILLARIO and ALEJANDRO ARROYO-LOPEZ**, defendants herein, did knowingly and willfully combine, conspire, confederate and agree together, with each other, and with diverse other persons whose names are to the grand jury known and unknown, including Jeffrey Daniel Preciado, to achieve the following objects of the conspiracy:

A. Methamphetamine: to possess with intent to distribute and to distribute fifty grams or more of methamphetamine or five hundred grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846;

B. Cocaine: to possess with intent to distribute and to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

It was part of this conspiracy for certain of the defendants and others to store, transport, and conceal controlled substances.

It was part of this conspiracy for certain of the defendants and others to utilize telephones or cellular telephones to further the possession and distribution of controlled substances.

It was part of this conspiracy for certain of the defendants and others to process, store, weigh, and package controlled substances for distribution.

It was part of this conspiracy for certain of the defendants and others to purchase, maintain, and use vehicles to further the possession and distribution of controlled substances.

It was part of this conspiracy for certain of the defendants and others to maintain premises for the purposes of storing, packaging, possessing, and distributing controlled substances.

It was part of this conspiracy for certain of the defendants and others to introduce customers and facilitate possession and distribution of controlled substances.

It was part of this conspiracy for certain of the defendants to store and transport cash proceeds of distribution of controlled substances.

It was part of this conspiracy for certain of the defendants to store and transport cash proceeds of distribution of controlled substances and to transmit that money through wire or bank

transfer to Mexico.

In furtherance of this conspiracy and to effect and accomplish its objectives, the defendants and other co-conspirators committed one or more of the following overt acts:

OVERT ACTS

1. As listed in Counts 2 and 3, below.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841 (b)(1)(A) and (b)(1)(C) and 846 and Title 18, United States Code, Section 2.

COUNT 2

[Distribution of Methamphetamine]

On or about November 17, 2010, in the District of Oregon, **MOISES LOPEZ-PRADO**, **JOSE TEXCO HILLARIO**, and **ALEJANDRO ARROYO-LOPEZ** defendants herein, did knowingly and intentionally distribute fifty grams or more of methamphetamine, or five hundred grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 3

[Distribution of Cocaine]

On or about November 17, 2010, in the District of Oregon, **MOISES LOPEZ-PRADO**, **JOSE TEXCO HILLARIO**, and **ALEJANDRO ARROYO-LOPEZ** , defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

As a result of committing the controlled substance offense or offenses alleged in this Indictment, **MOISES LOPEZ-PRADO, JOSE TEXCO HILLARIO, and ALEJANDRO ARROYO-LOPEZ**, defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds that said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in this indictment.

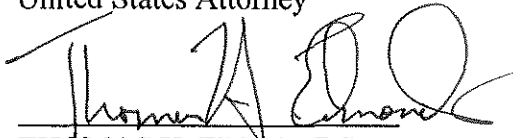
All as provided in Title 21, United States Code, Section 853.

Dated this 20th day of July 2011.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:
DWIGHT C. HOLTON
United States Attorney


THOMAS H. EDMONDS
Assistant United States Attorney